

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

DISTRICT OF NH
FILED

2020 JUN 26 P 1:06

Sensa Verogna, Plaintiff,)
v.)
Twitter Inc., Defendant.)

Case #: 1:20-cv-00536-SM 24 HOUR DEPOSITORY

**PLAINTIFFS REPLY AND MEMORANDUM OF LAW TO DEFENDANT'S
OBJECTION TO PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT
BY CLERK**

1. Plaintiff, respectfully replies to Defendant's objections [Doc. 18] to Plaintiff's "Request" for Entry of Default Judgment by Clerk and attached Declaration [Doc. 8]. In support of his replies, Plaintiff further submits, Plaintiff's Memorandum of Law in Support of his Objection to the Defendants Objections to Plaintiff's Motions for Default Judgement under Fed. R. Civ. P. 55(b)(1) and Local Rule 55.1(b).

2. Defendant, Twitter, Inc. as defendant has failed to plead or otherwise defend Plaintiff's Complaint and Summons by June 1, 2020 and that the plaintiff's claim is for a sum certain or a sum that can be made certain by computation in the amount of \$750,014,220, against a defendant who has been defaulted for not appearing and who is neither a minor nor an incompetent person. Plaintiff has moved for Entry of Default by Clerk and no response has been given. [Doc. 7].

WHEREFORE, for the reasons set forth within the Plaintiff's Complaint [Doc. 1], the Plaintiff's Request for Default by Clerk and attached Declaration [Doc. 7], and the within Plaintiff's Reply and Memorandum of Law in Support to Defendant's Objection to Plaintiff's Motion for Default. [Doc. 25], and attached Declaration, the Plaintiff, respectfully requests that this Honorable Court:

29 A. ORDER Entry of Default Judgment by Clerk in the amount of \$750,014,220,
30 (Seven hundred fifty million fourteen thousand two hundred twenty dollars); and

31 B. ORDER a preliminary injunction; (a) requiring Twitter to reinstate and un-ban
32 Plaintiff's Twitter account and contract to its original December 5, 2019 form, (b) prohibit Twitter
33 from banning white users due to their race in violation of 42 U.S.C. § 1981 or 42 U.S.C. § 2000a
34 and N.H.R.S.A 354-A:17, and (c) prohibit Twitter from violating users Speech, users Freedom to
35 Assemble and Freedom of Expression under Part I, Articles 22 and 32 of the New Hampshire
36 Constitution and the U.S. Constitution Article [I] Freedom of expression and the Due Process and
37 within the Equal Protections clauses Articles [IV] and [XIV].

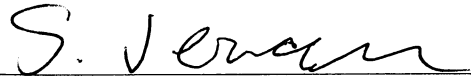
38 C. ORDER a permanent injunction requiring Twitter to; (a) re-instate any account
39 banned due to Twitters discriminatory actions and/or business practices or activities; (b) undergo
40 an independent third-party civil rights audit and report back to the Court its findings, to ensure that
41 [it] is free from bias and discrimination within all its business activities and commerce activities;
42 and (c) Retain a post judgement enforcement mechanism to ensure no future commerce violations
43 occur.

44 D. ORDER further civil penalties; (a) of \$5,000 for each violation found by
45 independent third-party audit; (b) Disgorge all or part of the profits Twitter made through
46 advertising sales while conducting the above stated violations of commerce.

47 E. DECLARE Twitter, Inc. is a Public Accommodation under Law and it's
48 computer network a Public forum.

49
50 B. Grant such other and further relief as the Court deems just.
51

Respectfully,



/s/ Plaintiff, Anonymously as Sensa Verogna
SensaVerogna@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of June 2020, the foregoing document was made upon the Defendant, through its attorneys of record to Jonathan M. Eck jeck@orr-reno.com and Julie E. Schwartz, Esq., JSchwartz@perkinscoie.com